

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(SOUTHERN DIVISION)**

MELONY WHEELER, *et al.*

*

*

Plaintiffs,

**Civil Action No.
08-CV-774 (DKC)**

*

v.

*

GREGORY LEONARD, *et al.*

*

Defendants.

* * * * *

**MOTION TO SHORTEN TIME FOR PLAINTIFFS TO
RESPOND TO NRT MID-ATLANTIC, LLC'S MOTION
TO COMPEL DISCOVERY AND FOR SANCTIONS**

Defendant NRT Mid-Atlantic, LLC d/b/a Coldwell Banker Residential Brokerage ("NRT"), by and through its undersigned counsel, hereby files this Motion to Shorten Time for Plaintiffs to Respond to NRT Mid-Atlantic, LLC's Motion to Compel Discovery and For Sanctions. As grounds in support of its Motion, NRT states as follows:

1) Contemporaneous with the filing of this Motion, NRT also filed a Motion to Compel Discovery and For Sanctions.

2) NRT asks this Court to shorten the time period for Plaintiffs to respond to its Motion to Compel Discovery and For Sanctions to Wednesday, April 29, 2009.

3) NRT's request to shorten the time period for Plaintiffs to respond to its Motion to Compel Discovery and For Sanctions is based on the fact that the dispositive motions deadline in this case is May 18, 2009 and NRT intends to file a Motion for Summary Judgment by the dispositive motions deadline. NRT requires sufficient time to assess Plaintiffs' discovery responses in advance of filing its Motion for Summary Judgment. The Motion to Compel

Discovery and For Sanctions seeks an Order requiring Plaintiffs to provide discovery responses no later than May 4, 2009.

4) Plaintiffs' responses to NRT's discovery requests were due on April 15, 2009. Plaintiffs have failed to respond to NRT's good faith attempts to resolve this discovery dispute prompting NRT to file contemporaneously with this Motion the Motion to Compel Discovery and For Sanctions.

5) NRT will serve this Motion, as well as its Motion to Compel Discovery and For Sanctions, via facsimile, electronic mail and Federal Express mail to Jonathan C. Silverman, Esquire, counsel for Plaintiffs, and via Federal Express mail to all Plaintiffs.¹

WHEREFORE, Defendant NRT Mid-Atlantic, LLC d/b/a Coldwell Banker Residential Brokerage respectfully requests that this Court shorten the time for Plaintiffs to respond to NRT Mid-Atlantic, LLC's Motion to Compel Discovery and For Sanctions so that Plaintiffs' response will be due on Wednesday, April 29, 2009.

April 24, 2009

Respectfully submitted,

s/

Jason M. St. John (Federal Bar No. 26384)
Indira K. Sharma (Federal Bar No. 28269)
SAUL EWING LLP
Lockwood Place
500 East Pratt Street – 8th Floor
Baltimore, Maryland 21202
(410) 332-8898 (telephone)
(410) 332-8288 (fax)
jstjohn@saul.com

Counsel for Defendants,
NRT Mid-Atlantic LLC and
Brian Taylor

¹ Service of this Motion and the Motion to Compel Discovery and For Sanctions is also being made on the Plaintiffs in light of the Court's correspondence to Mr. Silverman dated April 22, 2009 noting that he had failed to file his entry of appearance with the Court although he had served the undersigned counsel with a copy of the document.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of April, 2009, copies of the foregoing Motion to Shorten Time for Plaintiffs to Respond to NRT Mid-Atlantic, LLC's Motion to Compel Discovery and For Sanctions were sent by facsimile, electronic mail and Federal Express mail, postage prepaid, to:

Jonathan Charles Silverman, Esquire
5437 Connecticut Avenue, NW, #807
Washington, D.C. 20015
Counsel for Plaintiffs;

and by Federal Express mail, postage prepaid, to:

Melony Wheeler
2403 Kristyn Lane
Fort Washington, MD 20744
Plaintiff;

Elwood Scott
2003 Powderhorn Drive
Ft. Washington, MD 20744
Plaintiff; and

Ramona Scott
2003 Powderhorn Drive
Ft. Washington, MD 20744
Plaintiff

s/
Indira K. Sharma